

## Supporting Statement A

### U.S. Election Assistance Commission

#### Study of the Feasibility and Advisability of Establishing a Program of Free Return or Reduced Postage for Absentee Ballots

#### Survey of Registered Voters

#### A. JUSTIFICATION

##### 1. Explain the circumstances that make the collection of information necessary.

Section 246 of the Help America Vote Act (HAVA) of 2002 (42 U.S.C. 15301) mandates that the U.S. Election Assistance Commission (EAC), in consultation with the United States Postal Service, to conduct a study on the feasibility and advisability of establishing a program under which the U.S. Postal Service shall waive or otherwise reduce the amount of postage applicable with respect to absentee ballots returned by voters in general elections for Federal office. This study does not address the cost to the U.S. Postal Service for free postage for sending absentee ballots but may consider costs to election officials that are related to implementing such a program including the costs of sending absentee ballots to voters. It also does not include consideration of the 39 USC 3406 provisions for the mailing of balloting materials for military and overseas absentee voters. As part of the study the Commission is directed to conduct a survey of potential beneficiaries, including the elderly and disabled, and to take into account the results of this survey in determining the feasibility and advisability of establishing such a program. HAVA §246(b)(1) requires the Commission to submit to Congress a report on the study conducted under HAVA §246(a)(1) together with recommendations for such legislative actions as the Commission determines appropriate. In addition, the report is required to contain an estimate of the costs of establishing the program described in HAVA §246(a)(1), an analysis of the feasibility of implementing such program with respect to the absentee ballots to be submitted in the general election for Federal office held in 2004, and recommendations on ways the program would target elderly individuals and individuals with disabilities and methods for increasing the number of such individuals who vote in elections for Federal office.

##### 2. Explain how, by whom, how frequently, and for what purpose the information will be used. If the information collected will be disseminated to the public or used to support information that will be disseminated to the public, then explain how the collection complies with all applicable Information Quality Guidelines.

HAVA §246 mandates the EAC conduct a one-time information collection regarding the feasibility and advisability of establishing a program under which the U.S. Postal Service shall waive or otherwise reduce the amount of postage applicable with respect to absentee ballots returned by voters in general elections for Federal office. HAVA §246(b)(1) requires the Commission to submit to Congress a report on the study conducted under HAVA §246(a)(1) together with recommendations for such legislative actions as the Commission determines

appropriate. In addition, the report is required to contain an estimate of the costs of establishing the program described in HAVA §246(a)(1), an analysis of the feasibility of implementing such program with respect to the absentee ballots to be submitted in the general election for Federal office held in 2004, and recommendations on ways the program would target elderly individuals and individuals with disabilities and methods for increasing the number of such individuals who vote in elections for Federal office.

The information for this collection will be collected through a one-time public opinion survey of 1,200 randomly selected U.S. citizens throughout the fifty U.S. States and through nine focus groups meetings designed to explore, in-depth, issues concerning the potential beneficiaries of this program. The beneficiaries include those who will be more likely to participate in federal elections should this program be implemented, including the elderly, the disabled, and the impoverished. This Information Collection Request (ICR) is only for the national survey, the focus groups are being submitted as a separate ICR for review and clearance in accordance with the Paperwork Reduction Act of 1995.

**3. Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological techniques or other forms of information technology.**

The collection of information does utilize Computer Assisted Telephone Interviewing (CATI) technology. CATI will be used to conduct the public opinion survey. CATI is a telephone surveying technique in which the interviewer follows a script by a software application. The software is able to customize the flow of the questionnaire based on the answers provided, as well as information already known about the participant.

**4. Describe efforts to identify duplication.**

This information collection is mandated by HAVA §246. Previous and contemporaneous public opinion surveys on the subject matter have been reviewed to eliminate duplication.

**5. If the collection of information involves small businesses or other small entities, describe the methods used to minimize burden.**

This collection of information does not involve small businesses or other small entities.

**6. Describe the consequences to the Federal program or policy activities if the collection is not conducted or is conducted less frequently.**

HAVA §246 mandates the EAC conduct this information collection. This is a one-time information collection. HAVA §246(b)(1) requires the Commission to submit to Congress a report on the study conducted under HAVA §246(a)(1) together with recommendations for such

legislative actions as the Commission determines appropriate. In addition, the report is required to contain an estimate of the costs of establishing the program described in HAVA §246(a)(1), an analysis of the feasibility of implementing such program with respect to the absentee ballots to be submitted in the general election for Federal office held in 2004, and recommendations on ways the program would target elderly individuals and individuals with disabilities and methods for increasing the number of such individuals who vote in elections for Federal office. Failure to conduct the collection of this information may result in the EAC being unable to meet its statutory requirements under HAVA (42 U.S.C. 15301). This information collection was required to be carried out no later than the date that was 1 year after the date of the enactment of HAVA (2002); as such, it is not recommended that the collection or the report due to Congress be delayed further.

**7. Explain any special circumstances that require the collection to be conducted in a manner inconsistent with OMB guidelines.**

Not applicable.

**8. Provide a copy of the PRA Federal Register notice that solicited public comments on the information collection prior to this submission. Summarize the public comments received in response to that notice and describe the actions taken by the agency in response to those comments. Describe the efforts to consult with persons outside the agency to obtain their views on the availability of data, frequency of collection, the clarity of instructions and recordkeeping, disclosure, or reporting format (if any), and on the data elements to be recorded, disclosed, or reported.**

The EAC published a notice in the Federal Register on January 23, 2007, at 72 FR 2875 soliciting comments for a period of sixty (60) days. A second notice was published on May 18, 2007, at 72 FR 28037 soliciting comments for a period of thirty (30) days. This information collection request received only one comment. The comment asked how the accuracy of the sample would be harmed through the exclusion of respondents who could only be reached through a cell phone, and it suggested that the sample include respondents that could be reached both through landline telephones and cell phones. Research was conducted to evaluate this claim and determine if it was necessary to include cell phone users in this study. Based upon this research, it was determined that the study would still be conducted using only random digit dialing technology (RDD). The Commission and its contractor for the study consulted with the U.S. Postal Service during the development of the information collection instrument. A copy of the Federal Register notices, a summary of the comments received, and an explanation of the revisions made after the conclusion of the 60-day public comment period have been submitted with this ICR.

**9. Explain any decisions to provide payments or gifts to respondents, other than remuneration of contractors or grantees.**

The EAC will not provide any payment or gift to respondents of this collection.

**10. Describe any assurance of confidentiality provided to respondents and the basis for assurance in statute, regulation, or agency policy.**

Prior to volunteering to participate, respondents will be assured that responses will not be associated with a particular respondent.

**11. Provide additional justification for any questions of a sensitive nature, such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private.**

There are no questions of a sensitive nature.

**12. Provide an estimate in hours of the burden of the collection of information.**

The burden to each respondent is 15 minutes. Twelve hundred (1,200) respondents are required for this study. Total annual burden is estimated at 300 hours.

- a. Number of respondents = 1,200
- b. Number of responses per each respondent = 1
- c. Total annual responses = 1
- d. Hours per response = .25 hours
- e. Total annual reporting burden = 300 hours (*# of respondents x frequency of response x hours of response*)

**13. Provide an estimate of the total annual cost burden to the respondents or record-keepers resulting from the collection (excluding the value of the burden hours in #12 above).**

The EAC has identified no reporting and recordkeeping “non-hour cost” burdens associated with this proposed collection of information.

**14. Provide estimates of annualized cost to the Federal government.**

The estimated cost to the Federal Government is \$40,100. This estimate includes \$34,000 for the public opinion research firm, \$6,000 for personnel, and \$100 in office expenses.

- We estimate \$34,000 for the public opinion research firm. This will include services for programming the survey instrument into a Computer Assisted Telephone Interviewing (CATI) system so that survey questions, instruction and response categories are displayed in the computer, conduct of 1,200 completed interviews, quality control, data entry, coding of data and delivery of final data.
- We estimate \$5,000 for personnel to design the study, oversee its implementation, analyze data, and draft a final report, and \$100 for office expenses including telephone and printing costs.

**15. Explain the reasons for any program changes or adjustments reported in Items 13 or 14 of the OMB 83-I.**

This is the first time this information collection has been performed by the Federal government.

**16. For collections whose results will be published, outline the plans for tabulation and publication.**

HAVA §246(b)(1) requires the Commission to submit to Congress a report on the study conducted under HAVA §246(a)(1) together with recommendations for such legislative actions as the Commission determines appropriate. In addition, the report is required to contain an estimate of the costs of establishing the program described in HAVA §246(a)(1), an analysis of the feasibility of implementing such program with respect to the absentee ballots to be submitted in the general election for Federal office held in 2004, and recommendations on ways the program would target elderly individuals and individuals with disabilities and methods for increasing the number of such individuals who vote in elections for Federal office. The report will also be made available to the public on the EAC website at [www.eac.gov](http://www.eac.gov).

**17. If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons why display would be inappropriate.**

Not applicable to this collection.

**18. Explain each exception to the certification statement identified in Item 19 of the OMB 83-I.**

To the extent that the topics apply to this collection of information, we are not making any exceptions to the “Certification for Paperwork Reduction Act Submissions.”